

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CHERYL COMPTON, et al.,)
)
)
Plaintiffs,)) Cause No. 4:11CV01975 CEJ
v.)
)
)
ST. LOUIS METROPOLITAN POLICE)
DEPARTMENT, et al.,)
)
)
Defendants.)

VERIFIED STATEMENT OF REASONABLE ATTORNEYS' FEES OF DEFENDANTS
ST. LOUIS METROPOLITAN POLICE DEPARTMENT, BOARD OF POLICE
COMMISSIONERS OF THE ST. LOUIS METROPOLITAN POLICE DEPARTMENT,
RICHARD GRAY, JERRY LEE, BETTYE BATTLE-TURNER,
THOMAS IRWIN AND FRANCIS SLAY

Come now Defendants St. Louis Metropolitan Police Department; Board of Police Commissioners of the St. Louis Metropolitan Police Department; Richard Gray, Jerry Lee, Bettye Battle-Turner, Thomas Irwin¹, and Francis Slay, in their official capacities as the Board of Police Commissioners of the St. Louis Metropolitan Police Department (hereinafter referred to collectively as "Police Defendants"), by and through undersigned counsel, and pursuant to the Court's Order dated December 31, 2012 [Doc. #70], files the following Verified Statement of Reasonable Attorneys' Fees in the above matter:

1. At all times relevant to this filing, Mark Lawson was employed as General Counsel for the St. Louis Metropolitan Police Department, and his hourly billing rate in that capacity for Civil Rights cases is \$275.00 per hour. *See Exhibit A (Affidavit of Mark Lawson)* at ¶ 5.

¹ Identified in the First Amended Complaint as "Thomas Irvin."

2. Attorney Lawson expended 14.5 hours at an hourly rate of \$275.00, for a total of \$3,987.50 in reasonable attorneys' fees expended as a direct result of plaintiffs' failure to respond to discovery. *Id.* at ¶¶ 6 & 7.

3. Police Defendants did not incur any taxable court costs as a direct result of plaintiff's failure to respond to discovery. *Id.* at ¶ 8.

WHEREFORE, Police Defendants pray an Order from the Court granting award of \$3,987.50 in reasonable attorneys' fees against the plaintiffs in this matter and for such other and further relief as the Court deems fair and reasonable under the premises.

BOARD OF POLICE COMMISSIONERS
OF THE CITY OF ST. LOUIS

/s/ Mark Lawson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed electronically with the Clerk of the Court on January 31, 2013, to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Mark Lawson
